

Exhibit F

Deposition of Dennis P. Cronin

(Pages: 15-16, 24-27)

(Exhibit: 2)

ORIGINAL TRANSCRIPT

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

CIVIL ACTION NUMBER: 04-11924-RGS

IAN J. BROWN, JAMES BROWN AND BARBARA BROWN,
Plaintiffs,

VS

UNITED STATES OF AMERICA, VERIZON NEW ENGLAND,
INC. and BOSTON EDISON COMPANY d/b/a NSTAR
ELECTRIC,

Defendants.

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30(b)(6) DEPOSITION OF U.S. AIR FORCE  
BY DENNIS P. CRONIN, taken on behalf of the  
Verizon New England, Inc., pursuant to the  
applicable provisions of the Massachusetts Rules  
of Civil Procedure, before Ayako Odanaka, Notary  
Public, Certified Shorthand Reporter and  
Registered Professional Reporter within and for  
the Commonwealth of Massachusetts, at the  
Offices of Prince, Lobel, Glovsky & Tye, LLP,  
585 Commercial Street, Boston, Massachusetts, on  
April 28, 2005, at 1:10 p.m., as follows:



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1 Q. Okay. What internal licenses and  
2 leases did you review?

3 A. Specifically, the ones we had on  
4 file that related to any parcel or piece  
5 of property over in the trailer park area  
6 off of Hartwell.

7 Q. And where are those documents kept?

8 A. They're kept on file in our main CE  
9 building.

10 Q. I'm sorry, your main?

11 A. CE building, civil engineering  
12 building.

13 Q. Do you remember how many of those  
14 documents you looked at that related  
15 specifically to property off of Hartwell  
16 Road?

17 A. There was probably six or seven.

18 Q. Okay. And to your knowledge, are  
19 documents relating to property owned by  
20 the Air Force kept anywhere else other  
21 than where you looked in the main CE  
22 building?

23 A. No.

24 Q. Does -- What's your understanding,



1 from looking at those documents, as to  
2 whether the Air Force has any interest in  
3 land over which Hartwell Road passes?

4 A. The only interest the Air Force has  
5 is in the trailer park.

6 Q. And what is that interest?

7 A. To maintain what we classify as the  
8 mobile home park, which is on both sides,  
9 both the north and the south side of  
10 Hartwell.

11 Q. Do you have an understanding  
12 whether the Air Force owns that property?

13 A. The Air Force only owns a very  
14 small piece of property and the rest is  
15 from a lease agreement with Massport.

16 Q. Are you familiar with which piece  
17 -- You indicated that the Air Force only  
18 owns a small piece.

19 A. Acreage wise, yes.

20 Q. And do you know where that piece is  
21 located?

22 A. Pretty much.

23 Q. Well, let me ask you this. Is it  
24 located north of Hartwell Road?



1 A. Damian.

2 Q. Did you contact anyone else in the  
3 Navy concerning ownership of Hartwell Road?

4 A. No, I didn't.

5 Q. How about the Town of Bedford?

6 A. No.

7 Q. Okay. Did you take any other  
8 actions besides looking at these maps in  
9 preparation for the deposition today?

10 A. No.

11 Q. Okay. Have you been able to make  
12 a determination as to the government's --  
13 as to the Navy's interest in Hartwell  
14 Road?

15 A. Yes.

16 Q. Okay. And again, can you tell me  
17 what the basis of that determination is?

18 A. The transfer document at the time  
19 the Air Force transferred the property to  
20 the Navy.

21 Q. Uh-huh. Let me step back a second.  
22 Can you tell me the process you went  
23 through to locate these two maps?

24 A. Okay. The Exhibit 3, is it this



1 Q. And do you know whether that's a  
2 sublease agreement, meaning that the Air  
3 Force is already leasing that property and  
4 then subleasing it to Massport?

5 A. No, it is not.

6 Q. Do you know when the Air Force  
7 acquired that property?

8 A. Without looking at the file, it's  
9 -- the only thing I could tell you is  
10 back in the '50s. Early '50s.

11 Q. And do you have an understanding as  
12 to what -- what legal interest the Air  
13 Force took in that property?

14 MR. WILMOT: Off the record  
15 for a moment.

16 (Discussion off the record).

17 BY MR. LEWIN:

18 Q. Give me one minute.

19 Mr. Cronin, let me just clarify, is  
20 it your understanding that the Air Force  
21 does not own any portion of Hartwell Road?

22 A. That's correct.

23 Q. And the Air Force doesn't maintain  
24 Hartwell Road.



25

1 A. That's correct.

2 Q. Doesn't plow it.

3 A. That's correct.

4 Q. Sweep.

5 A. Negative.

6 Q. To your knowledge, is there any  
7 agreement between the United States  
8 Government and the Town of Bedford as to  
9 maintenance of Hartwell Road?

10 A. There is none.

11 Q. How about an agreement between the  
12 government and the Commonwealth of  
13 Massachusetts?

14 A. There is none.

15 Q. Between the government and  
16 Massport?

17 A. For Hartwell Road?

18 Q. Yes.

19 A. Negative.

20 Q. How about between the Air Force and  
21 anyone else concerning maintenance of  
22 Hartwell Road?

23 A. No.

24 Q. Do you know if the government



1 patrols Hartwell Road?

2 A. They do not.

3 Q. Who patrols the roads on Hartwell  
4 Air Force Base?

5 A. On Hanscom?

6 Q. I'm sorry. Yeah, Hanscom Air Force  
7 Base.

8 A. The security forces, the military  
9 security forces.

10 Q. Mr. Cronin, for the series of  
11 questions I've just asked you, would your  
12 answers be the same as to January 4th,  
13 2002?

14 A. That's correct.

15 Q. And that's to -- Well, let me just  
16 ask you this.

17 As of January 4th, 2002, did the  
18 Air Force own any portion of Hartwell  
19 Road?

20 A. No, they did not.

21 Q. And as to all the questions I've  
22 asked you with respect to maintenance of  
23 Hartwell Road, as of January 4th, 2002 --

24 A. We don't maintain it in any way.





1 Q. Likewise, as of January 4th, 2002,  
2 did the government patrol Hartwell Road?

3 A. No, they didn't.

4 Q. And do you know if there's any  
5 agreement between the government and --  
6 and any other entity regarding patrol of  
7 Hartwell Road?

8 A. No, there isn't.

9 Q. Do you know if the United States  
10 provides fire fighting services on Hartwell  
11 Road?

12 A. I can't answer with certainty on  
13 that, but I believe they have overlapping  
14 agreements with all the surrounding towns.  
15 But I couldn't answer that off the top of  
16 my head.

17 Q. Does -- does the Air Force provide  
18 fire fighting services on Hanscom Air  
19 Force Base?

20 A. Yes, they do.

21 Q. And does that extend to the runway  
22 area?

23 A. Yes, they have an agreement with  
24 Massport.

